IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS WACO DIVISION

H-E-B, LP,

Plaintiff,

v.

WADLEY HOLDINGS, LLC; SOUTHERN SALES & MARKETING GROUP, INC.; NINGBO KUER PLASTIC TECHNOLOGY CO., LTD.; NINGBO KUER KAYAK CO., LTD.; NINGBO KUER OUTDOOR PRODUCTS CO., LTD.; HOME DEPOT U.S.A., INC.; and HOME DEPOT PRODUCT AUTHORITY, LLC,

Defendants.

Case No. 6:20-CV-00081-ADA
JURY TRIAL DEMANDED

JOINT MOTION TO UNSEAL OMNIBUS ORDER

On September 30, 2021, the Court held a hearing on multiple motions from the parties. Although those motion papers had been sealed due to business information designated confidential under the Protective Order, the Court's resulting Omnibus Order on the motions (Docket No. 205) did not reference or otherwise divulge any of the parties' proprietary information. Knowing the Court's preference for matters being unsealed and available to the public whenever possible, the parties hereby jointly move the Court to unseal the Omnibus Order.

Dated: October 5, 2021 Respectfully submitted,

/s/ Joseph P. Reid

Thomas N. Millikan, Texas Bar No. 24105276

TMillikan@perkinscoie.com

Joseph P. Reid (Pro Hac Vice)

JReid@perkinscoie.com

Kyle R. Canavera (Pro Hac Vice)

KCanavera@perkinscoie.com

Abigail A. Gardner

Admitted to Western District of TX 5/4/21

AGardner@perkinscoie.com

PERKINS COIE LLP

11452 El Camino Real, Suite 300

San Diego, California 92130

Telephone: 858.720.5700 Facsimile: 858.720.5799

Skyler M. Howton, Texas Bar No. 24077907

SHowton@perkinscoie.com

PERKINS COIE LLP

500 N. Akard Street, Suite 3300

Dallas, Texas 75229

Telephone: 214.259.4951

Facsimile: 214.965.7799

Attorneys for Plaintiff H-E-B, LP

/s/ Jerry R. Selinger

Jerry R. Selinger

Texas State Bar No. 18008250

1700 Pacific Avenue, Suite 2650

Dallas, TX 75201Telephone: 214-272-0957

Facsimile: 713-623-4846

jselinger@pattersonsheridan.com

Abelino Reyna

Texas State Bar No. 24000087

900 Washington Ave., Suite 503

Waco, TX 76701

Telephone: 254-777-5248

Facsimile: 877-777-8071

areyna@pattersonsheridan.com

John A. Yates
Texas Bar No. 24056569
Aaron D. Perkins
Texas State Bar No. 24048967
Edgar A. Gonzalez
Texas Bar No. 24092431
24 Greenway Plaza, Suite 1600
Houston, Texas 77046
Telephone: 713-623-4844
Facsimile: 713-623-4846
jyates@pattersonsheridan.com
aperkins@pattersonsheridan.com
egonzalez@pattersonsheridan.com

Attorneys for Defendants Home Depot U.S.A., Inc. and Home Depot Product Authority, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served by email on October 5, 2021, to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Local Rule CV-5(b).

<u>/s/ Joseph P. Reid</u> Joseph P. Reid